

### **REMARKS**

This amendment is responsive to the Office Action dated November 21, 2005. Applicants have amended claims 1, 2, 9-16, 19, 23-30, 33-39 and 42. Claims 1, 2, 4-19, 21-40 and 42 remain pending.

#### **Claim Rejections Under 35 U.S.C. § 103**

In the Office Action, the Examiner: (1) rejected claims 1, 5-10, 13, 16-19, 23, 24, 27, 30-33, 35, 40 and 42 under 35 U.S.C. § 103(a) as being unpatentable over USPN 6,449,658 to Lafe et al. (Lafe) in view of USPN 6,728,785 to Jungck (Jungck) in further view of USPN 6,438,125 to Brothers (Brothers); (2) rejected claims 2 and 39 under 35 U.S.C. § 103(a) as being unpatentable over Lafe, in view of Jungck, and in further view of USPN 6,311,223 to Bodin et al. (Bodin); (3) rejected claims 11, 12, 25, 26, 34 and 36 under 35 U.S.C. § 103(a) as unpatentable over Lafe, in view of Jungck, and in further view of USPN 6,424,981 to Isaac et al. (Isaac); (4) rejected claims 14, 15, 28, 29, 37 and 39 under 35 U.S.C. § 103(a) as being unpatentable over Lafe, in view of Jungck, and in further view of USPN 6,546,388 to Edlund et al. (Edlund); and (5) rejected claims 21 and 22 under 35 U.S.C. § 103(a) as being unpatentable over Lafe, in view of Jungck, and in further view of USPN 6,557,005 to Burget (Burget).

Applicants respectfully traverse the rejections to the extent such rejections may be considered applicable to the claims as amended. For at least the reasons set forth below, the applied references fail to disclose or suggest the inventions defined by Applicants' claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed invention.

*1) Failure to teach or suggest an intermediate device that removes characters from non-renderable character data of web page source data*

Applicants' claims are directed to a method for transferring web page source data using an acceleration device positioned intermediate a remote client and a web server. Applicants have amended claim 1 to require filtering at least a portion of the non-renderable character data by removing one or more characters of the non-renderable character data from the original web page

source data, thereby creating modified web page source data. In the Office Action, the Examiner stated that he was interpreting the term filtering to read on *any kind* of modification or alteration.

Based on this reasoning, the Examiner cited Lafe et al. which teaches compressing and decompressing web page data by a server and client, respectively.<sup>1</sup> More specifically, Lafe et al. describes an intermediate devices that provides “intelligent, content-based compression/decompression algorithms that can compress pictures, images (e.g., JPEG and GIF files) and other media objects.”<sup>2</sup>

Compression and decompression as taught by Lafe would not have suggested an intermediate device that actually identifies non-renderable character data and then removes one or more characters of non-renderable character data, as required by Applicant’s amended independent claims 1, 19 and 33.

As another example, the applied references fail to disclose or suggest removing whitespace from original web page source data to create modified web page source data, as required by claim 12, as amended. Similarly, the applied references fail to teach or suggest a controller or acceleration device configured to remove white space from original web page source data to create modified web page source data, as respectively required by amended claim 26 and claim 34. Additionally, the applied references fail to disclose or suggest an acceleration device configured to remove hard returns from original web page source data to create modified web page source data, as required by claim 36.

Indeed, with respect to each of claims 9-16, 23-30 and 34-38, the Examiner’s arguments that it is known that web page source data includes the various items recited in those claims, such as whitespace, are insufficient to establish a prima facie case of obviousness. Each of these claims as presently presented requires identifying and removing the recited items. The mere knowledge that such items exist in web page source data would not have been sufficient to motivate a person of ordinary skill to modify the Lafe system to actually remove such items, particularly since Lafe describes only selective application of compression algorithms, as discussed above. Consequently, absent some teaching in the prior art of removing the recited items, the Examiner cannot establish a prima facie case of obviousness for these claims.

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<sup>1</sup> See, e.g., Lafe, Abstract and col. 2, ll. 49-54.

<sup>2</sup> Id at col. 5., ll. 28-31.

*2) Failure to teach or suggest an intermediate device that identifies renderable character data versus non-renderable character data within an original web page source data*

With respect to at least independent claim 1, Lafe provides no teaching or suggesting of an intermediate device that performs the express function of identifying within the original web page source data renderable character data and non-renderable character data. On this point, the Examiner replied that “the non-renderable data mentioned in the [claim] limitation is interpreted to be the ‘unsupported media object’ and other data that is mentioned in Lafe column 5 lines 28-38.

Applicant submits that Lafe fails to provide such a teaching for at least two reasons. First, Lafe describes applying compression algorithms (either lossless or lossy) to media objects, non-media objects, as well as unsupported media objects. In other words, assuming hypothetically that Lafe does recognize non-renderable data, Lafe treats non-renderable and renderable data in the same manner, i.e., that compression is applied regardless. Lafe does not teach or suggest the function of identifying a difference between non-renderable character data, and then only removing a portion of only the non-renderable character data.

Second, this Examiner’s interpretation of the “unsupported media objects” of Lafe as non-renderable *character* data is inconsistent with the statements in Lafe. In particular, the portion of Lafe cited by the Examiner states that text (i.e., character data) are “non-media objects.” Thus, Lafe’s use of the term “unsupported media objects” must mean data other than text and, therefore, cannot be interpreted to encompass non-renderable character data. The unsupported media objects of Lafe apparently do not constitute *character* data as Lafe instead refers to text as non-media objects.

*3) Failure to teach or suggest transmitting the original web page source data to the remote client, including the characters that were removed, after transmitting the modified web page source data to the remote client*

In addition, the applied references fail to disclose or suggest an intermediate device that transmits original web page source data to a remote client including the characters that were removed after transmitting a modified version of that same web page source data to the remote client.

In the Office Action, the Examiner stated that Applicant argues that “Brothers fails to teach modification of web page source data.” This is, in fact, an incorrect characterization of Applicants’ arguments. Applicants understand that the Examiner cites Lafe for modifying web page source data. Correctly stated, Applicants submit that none of the references, either singularly or in combination, teach or suggest transmitting original web page source data, including the characters that were removed, after transmitting the same web page source data in a modified form.

For example, in the Office Action, the Examiner stated, “Brothers teaches after transmitting a modified web page to the remote client, transmitting the original web page source data to the remote client for pupose of flexibly viewing web pages.”<sup>3</sup> Applicants again respectfully suggest that the Examiner appears to have misunderstood the Brothers disclosure.

Brothers describes a method and system for redirecting web page requests. Brothers teaches temporarily substituting a “different (replacement) web page” for the web page actually requested by client, e.g., temporarily redirecting the user to an advertisement prior to sending the requested web page.<sup>4</sup>

Thus, the Examiner’s statement that “Brothers teaches after transmitting a modified web page to the remote client, transmitting the original web page source data to the remote client for purpose of flexibly viewing web pages.” Applicants’ claim 1 requires the step of, after transmitting a modified version of a web page having removed characters, transmitting the original web page *including characters that were previously removed*. Thus, there is a direct correlation between the modified version of the web page that is first transmitted and the original web page that is subsequently transmitted, i.e., the modified version and the original version only differ by the characters that the intermediate device automatically removed.

In contrast, the web page data of the replacement advertisement web page to which a user is redirected by the Brothers’ system has no correlation with the data of the web page that is subsequently transmitted to the user. This teaching would not have suggested transmitting original web page source data to a remote client after transmitting modified version with that same web page source data to the remote client to one of ordinary skill art. Further, none of the

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<sup>3</sup> Office Action, page 5.

<sup>4</sup> See, e.g., Brothers, Abstract and col. 1, ln. 51 – col. 2, ln. 46.

other applied references provides any teaching that would have suggested this requirement of Applicants' independent claims to one of ordinary skill in the art. Modification of Lafe in view of Brothers, as suggested by the Examiner, would result in a system that first redirects a user to an advertisement and secondly directs the user to a compressed version of a web page. In neither case is the original unmodified version of the web page transmitted to the user, let alone after the modified version.

*4) Failure to teach an intermediate device that rewrites characters into lowercase*

Applicants' have amended certain dependent claims to require identifying tags of the web page source data having one or more uppercase characters, and rewriting the identified tags of the web page source data *to have the same characters but in a lowercase*. This non-narrowing amendment should clarify the differences between these claims and Bodin, which teaches "tokenizing" tags.

For at least these reasons, the Examiner has failed to establish a prima facie case for non-patentability of Applicant's claims 1, 2, 4-19, 21-40 and 42 under 35 U.S.C. 103(a). Withdrawal of these rejections is requested.

### CONCLUSION

All claims in this application are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 50-1778. The Examiner is invited to telephone the below-signed attorney to discuss this application.

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By:

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